

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
Carl Spilly (admitted *pro hac vice*)
carlspilly@quinnemanuel.com
1300 I. Street, N.W., Suite 900
Washington, D.C. 20005
Telephone: 202-538-8000
Facsimile: 202-538-8100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Jomaire A. Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

Case No. 5:20-cv-03664-YGR-SVK

**DECLARATION OF CHETNA BINDRA
IN SUPPORT OF GOOGLE'S
ASSERTION OF PRIVILEGE**

Referral: Hon. Susan van Keulen, USMJ

GOOGLE LLC,
Defendant.

I, Chetna Bindra, declare as follows:

1. I am a Google Product Manager. I make this declaration of my own personal, firsthand knowledge, and if called as a witness, I could and would testify competently thereto.
2. In my role as a Google Product Manager, I have regularly communicated with Google engineers and Google in-house counsel to discuss legal advice regarding Google's compliance with privacy and competition regulations and laws in connection with the implementation of changes to certain user controls and settings.
3. I am familiar with and was directly involved in preparing, reviewing, and presenting GOOG-CABR-05269357.R and the information contained therein.
4. I understand that the information contained in GOOG-CABR-05269357.R (at -380.R-81.R) has been redacted and withheld from disclosure.
5. The redacted text on GOOG-CABR-05269357.R at -380.R-81.R consists of slides and speaker notes containing and reflecting legal guidance from Google in-house counsel regarding regulatory compliance and competition issues. As indicated by the reference to "legal advice" in the speaker notes, this information was prepared by non-attorneys in collaboration with Google in-house counsel, and it contains and reflects Google in-house counsel's legal advice regarding certain user controls and settings designed to comply with privacy and competition laws and regulations.

6. It is and was my understanding that the redacted information noted above was confidential and privileged within Google, and was sent for the purposes of conveying legal advice of Google in-house counsel along with proposed changes to user settings and controls that reflect and incorporate this legal advice.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed in Parker, Colorado on April 8, 2022.

DATED: April 8, 2022.

By /s/Chetna Bindra
Chetna Bindra